

From: Garcia, Al
Sent: Monday, April 15, 2019 7:34 AM
To: Matthew Culp; Mark Fitzwater; LeAnn J. Wiegand
Cc: Alysia Tien
Subject: City of Helena Draft Local limits

Good Morning,

As we discussed in our telephone conversation on April 8, 2019, enclosed are the EPA's comments/feedback to the City of Helena draft local limits submitted on February 12, 2019. The comments are intended to ensure the draft local limits are approvable by the EPA and are organized to correlate with the sections in the Local Limits submittal:

Section 4 – Identification of Pollutants of Concern

- Table 4-1 indicates that the City gathered sufficient datasets for the local limits inputs. However, the data gathered for both the commercial and domestic sector of the service area are 6 data points collected in 2016. The EPA recommends a minimum of 10 data points for the commercial and domestic dataset because these represent the uncontrollable loadings from the service area. Uncontrollable loadings generated from this dataset and input into the local limits spreadsheet significantly affect the calculations. The City should ensure this dataset is representative and is current of the service area. In addition, a sampling event for the commercial dataset does not have a sampling date; the City needs to evaluate its analytical hard copies and provide the sampling date. (Note: any sampling data without the supporting analytical laboratory copies is not valid for local limits.)
- 4.3.6 – Although the monthly BOD and TSS values exceed 70% of the POTW's design capacity, the City is not designating these as pollutants of concern because the effluent values do not exceed 7% of the NPDES permit limit and the City states that its SIUs do not contribute these pollutants. The POTW's removal efficiency allows the City to consistently meet the permit limits, however, the City should determine if the 70% exceedance of the POTW's BOD and TSS design capacity is due to non-domestic users or if the BOD and TSS contributions are from the domestic sector. The EPA recommends the City evaluate their IU inventory to determine if any IUs that are currently not permitted contribute BOD and TSS. The City should also sample their domestic sectors to quantify the BOD and TSS loadings.

Section 6 – Local Limits Development Summary

- The City of Helena used a hardness value of 104 mg/L CaCO₃ although recent data and statistical evaluation provided evidence of using 134 mg/L CaCO₃. The EPA recommends the City use the statistically valid hardness data of 134 mg/L CaCO₃ to calculate local limits.
- Sections 6.4.12 and 6.4.13 -- The City has a typo for the safety/expansion factor. The factor used in the Table 12 and 13 is 15% instead of 10%.

Section 7 – Local Limits Spreadsheet

- The draft local limits are significantly higher than historical limits. The City should ensure the datasets are representative and current of the service area, as discussed previously for the uncontrollable domestic and commercial loading. The City should also evaluate the Literature selection of the POTW removal efficiency. These factors significantly affect local limits calculations. There are also options to evaluate in the current local limits calculations or additional factors to consider applying in the calculations to develop limits similar to

historical local limits. All options discussed below require the City to provide justification for the technical calculations to ensure this is approvable by the EPA and to provide to the public during the EPA's public notice:

- As we discussed, the City should also evaluate the use of the safety factor. The EPA recommends a minimum of 10% and the City used 15%. However, the City is not limited by 15% and does not have to apply the same safety factor for each pollutant of concern. The City can determine how large a safety factor to use for each pollutant of concern.
- In addition, the City may elect to apply a reserve or growth factor to the calculated MAIL. The EPA approves the datasets (to ensure they are representative and current of the service area), the use of POTW standards (to ensure they are current), the technical evaluation (based on a mass balance), the calculated MAIL and the allocation of the MAIL into concentration-based or mass limits. If the City applies a reserve or growth factor after the calculation of the MAIL, then it can release the reserved mass without requiring EPA approval. For example, the City may elect to reserve 75% of the calculated total Cr MAIL and only allocate 25% to the SIUs.
- The City has developed daily and monthly local limits but may elect to develop protective limits that are based on the most stringent acute and chronic criteria and therefore, can use these limit for short-term or long-term compliance. Typically, these limits are used as daily average.

Thank you for discussing the City of Helena draft local limits with the EPA, it was very helpful to get your input and perspective in this matter. The EPA is interested in continuing to work with the City to ensure the local limits are approvable.

Please contact me if you have any questions in this matter.

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